

6. Defendant Infinity received service of Plaintiffs' Amended Complaint on July 29, 2013. Defendant Infinity's Answer to Plaintiffs' Amended Complaint was due on or before August 19, 2013.

7. Defendant Infinity has not filed its Answer nor contacted Plaintiffs' attorneys requesting an extension to answer.

8. Federal Rule of Civil Procedure 55(a) provides that "when a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party's default."

9. Defendant Infinity is not a minor or an incompetent person. Defendant Infinity is not serving in our country's armed forces. It is a company.

10. Defendant Infinity has failed to plead or otherwise defend itself against Plaintiffs' Amended Complaint.

WHEREFORE, Plaintiffs respectfully request this Honorable Court grant their instant request and direct the Clerk of this Court to enter a default against Defendant, INFINITY ASSET ACCEPTANCE, LLC for failure to timely plead or otherwise defend against Plaintiffs' Amended Complaint.

Respectfully Submitted,

/s/ Victor R. Wandres
Victor R. Wandres, OBA #19591
Paramount Law
4835 S. Peoria Ave., Suite 1
Tulsa, OK 74105
(918) 200-9272 voice
(918) 895-9774 fax
victor@paramount-law.net